

Morris James LLP

Kenneth L. Dorsney
302.888.6855
kdorsney@morrisjames.com

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VIA EFILING

The Honorable Richard G. Andrews
USDC for the District of Delaware
844 N. King Street
Wilmington, DE 19801

Re: *TQ Delta, LLC v. ZyXEL Communications Inc. et al*, C.A. No. 13-2013-RGA

Dear Judge Andrews:

In compliance with the Court's oral order during the parties' January 5, 2015 status conference, ZyXEL confirmed that it has produced all third party core technical documents (*e.g.*, xDSL chip data sheets, specifications, etc.) that are in its possession, custody, or control with respect to all of its xDSL chip-suppliers except of those that are subject to confidentiality obligation with Lantiq Deutschland GmbH (and/or its affiliates) ("Lantiq"), a supplier. ZyXEL is not withholding any third party documents other than the Lantiq documents.

In the process of collecting core technical documents and other documents responsive to TQ Delta's requests, ZyXEL advised Lantiq that its confidential documents were the subject of such requests and asked whether Lantiq had any objection to their production. Lantiq strenuously objected to ZyXEL's providing Lantiq's information to TQ Delta in any form. Under these circumstances, it would be inappropriate for ZyXEL not to oppose TQ Delta's motion. Instead, ZyXEL proposes that Lantiq be given notice of TQ Delta's motion and have an opportunity to take whatever measures it deems appropriate to oppose the document production, as it would if TQ Delta sought the same information directly from Lantiq.

Respectfully,

/s/ Kenneth L. Dorsney

Kenneth L. Dorsney (#3726)
kdorsney@morrisjames.com

cc: All counsel of record (via CM/ECF)